

CALIFORNIA CIVIL RIGHTS LAW GROUP

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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT CITISTAFF SOLUTIONS,
INC.'S MOTION FOR SUMMARY
JUDGMENT**

Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 201

[PROPOSED] ORDER

Pursuant to Local Rules 7-11 and 79-5, as well as this Court's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz have filed an administrative motion for an order sealing the physical copies in the Court's files of Exhibits A through V to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Citistaff Solutions, Inc.'s Motion for Summary Judgment. According to the declaration filed by Plaintiffs' counsel, Lawrence Organ, in support of this Motion, Exhibits A through V should be sealed for the foregoing reasons:

Document	Basis for Sealing
Exhibit A: CITISTAFF-000034-CITISTAFF000035	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit B: CITISTAFF-000043	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit C- NS000004	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit D: Deposition of Owen Diaz	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit E: TESLA-0000511	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit F: TESLA-0000510	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit G: TESLA-0000667 to TESLA-0000671	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit H: TESLA-0000314 to TESLA-0000316	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit I: Deposition of Demetric Di-Az	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit J: Deposition of Lamar Patterson	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.

Exhibit K: TESLA-000060	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit L: TESLA-0000626	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit M: NS000138-NS000139	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit N: CITISTAFF-0000050-CITISTAFF-0000055	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit O: CITISTAFF-0000004-CITISTAFF-0000005	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit P: NS000038 – NS000045	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit Q: NS000095 - NS000100	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit R: NS000014	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit S: CITISTAFF-0000009-CITISTAFF-0000010	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit T: TESLA-0000321	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit U: TESLA-0000001 - TESLA-0000003	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.
Exhibit V: NS000175 - NS000178	Marked confidential pursuant to Protective Order (Dkt. No. 50). Filing this document would violate the Protective Order.

Appearing the requested relief is warranted, this Court orders that:

1. Plaintiffs' Administrative Motion to File Documents Under Seal in Support of Plaintiffs' Opposition to Defendant Citistaff Solutions, Inc.'s Motion for Summary Judgment is GRANTED.

1 2. The physical copies in the Court's files of Exhibits A through V to the Supplemental
2 Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Citistaff
3 Solutions, Inc.'s Motion for Summary Judgment shall be SEALED and remain sealed until
4 further order of the Court.

5
6 IT IS SO ORDERED.

7
8 DATED: _____, 2019

The Honorable William Orrick
United States District Court Judge